

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 13
Patrick William Kelly	:	
Stephanie Lynn Kelly	:	Bankruptcy Case No.: 19-13401ELF
	:	

**MOTION TO EXTEND TIME FOR THE DEBTOR TO FILE THEIR
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO
BANKRUPTCY RULE 1007(c)**

1. The above-captioned Chapter 13 Bankruptcy was filed on or about May 28, 2019 as an “emergency petition.”
2. The Chapter 13 Bankruptcy was assigned case number 19-13401ELF.
3. At the time of the subject Chapter 13 Bankruptcy filing, the Debtors due to a judgment to be collected on.
4. Due to the urgency involved, Debtors did not have sufficient time to complete their schedules and statements.
5. Debtors made all attempts to provide all required documentation to complete the preparation of their schedules, although this proved difficult in the time frame allotted. Documentation has now been provided.
6. Debtors have now provided all documentation, however, time to prepare the remaining schedules is required, as well as time for them to review their schedules with undersigned counsel.
7. The current deadline to file the schedules and statement of financial affairs is June 11, 2019.
8. Under Bankruptcy Rule 1007(c), the Debtors may obtain a further extension of the filing deadline for “cause” shown.

9. Under the circumstances, specifically the Debtor experienced some difficulty with obtaining some of the documentation required for the filing, the Debtor is requesting an extension of the June 11, 2019, filing deadline for a period of not less than 2 weeks for the remaining schedules and statements to be prepared and filed.

WHEREFORE, the Debtor respectfully request the entry of an ORDER in the form attached, extending the time for filing the required documents.

Dated: June 10, 2019

/s/ Brad J. Sadek
Brad J. Sadek, Esquire
Attorney for Debtor
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
215-545-0008